

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ABIMAEL ORTIZ FIGUEROA

CASE NO 16-00280 BKT

CHAPTER 13

**DEBTOR'S REPLY TO RELIABLE FINANCIAL SERVICES'
MOTION REQUESTING DISMISSAL, DOCKET NO. 19**

TO THE HONORABLE COURT:

COMES NOW, ABIMAEL ORTIZ FIGUEROA, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. Secured creditor Reliable Financial Services, Inc. ("Reliable") filed a *Motion Requesting Dismissal*, dated May 27, 2016, docket no. 19, wherein Reliable states that the debtor is in post-petition arrears on the car loan with said creditor, having accumulated the sum of \$867.30 in post-petition arrears, in the above captioned case.

2. The debtor hereby replies to Reliable's motion for dismissal stating that he admits to the post-petition car loan arrears which were caused by certain extraordinary expenses incurred by the debtor during the months of April and May, 2016, to cover for his daughter's high school graduation. The debtor proposes to cure the aforementioned post-petition arrears through the an amended Plan.

3. On this same date, June 06, 2016, the debtor filed an *Amended Chapter 13 Plan* in order to cure the post-petition arrears as stated by Reliable in its *Motion Requesting Dismissal*, docket entry #19, debtor to commence making direct current car loan payments to Reliable in June, 2016.

4. Based on the aforementioned, the debtor respectfully requests this Honorable Court deny Reliable's *Motion Requesting Dismissal*, dated May 27, 2016, docket no. 19, in the above captioned case.

WHEREFORE debtor respectfully prays that Reliable's motion requesting dismissal, docket no. 19, be denied.

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I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq.; to Reliable Financial Services, Inc., Carlos E Perez Pastrana, Esq., Counsel for Reliable; and also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: debtor, Abimael Ortiz Figueroa, HC 4 Box 44847 Caguas PR 00725, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 06th day of June, 2016.

/s/ Roberto Figueroa Carrasquillo

USDC #203614

RFIGUEROA CARRASQUILLO LAW OFFICE PSC

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